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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re FACEBOOK BIOMETRIC  
INFORMATION PRIVACY LITIGATION

) Master File No. 3:15-cv-03747-JD

) CLASS ACTION

) This Document Relates To:

) JOINT REQUEST FOR EXTENSION

) ALL ACTIONS.

1 The parties hereby jointly request an extension of time, to and including April 17, 2020, to  
2 file a motion for preliminary approval of the proposed class action settlement in this action. In  
3 support of their request, they state as follows:

4 1. On February 6, 2020, the parties advised the Court that they expected to file a  
5 preliminary approval motion by March 12, 2020. The parties have been working diligently  
6 (including through weekends) to meet that deadline, however, they require additional time in order  
7 for Facebook to provide plaintiffs with certain information necessary to implement the settlement.  
8 Specifically, Facebook is compiling the data necessary for the parties to evaluate class  
9 membership, in order to both enable class notice and process claims.

10 2. While this process for delivering class notice had begun when the Court ordered  
11 notice in May 2018 (ECF No. 390), it was put on hold after the Ninth Circuit Court of Appeals  
12 stayed the matter on Facebook's emergency motion and the data needed to be re-run in any event.  
13 Additionally, the parties are working through the optimal parameters for claims notice, which may  
14 not be identical to the previously determined parameters for trial notice. Due to the quantity and  
15 complexity of the data involved, Facebook's engineers estimate they will require two to three more  
16 weeks to compile the necessary data and vet its accuracy. After that, Class Counsel will require  
17 additional time to evaluate the accuracy of the information provided by Facebook. The parties  
18 request this extension in part because they anticipate these tasks will take longer than is usual in  
19 light of the fact that many individuals, including most Facebook employees, are currently working  
20 remotely as a precaution against the spread of the novel coronavirus.

21 3. The parties have made significant progress with the drafting of the settlement  
22 agreement, the settlement notices, and the preliminary approval briefing, such that once the above  
23 work is complete, the parties do not anticipate it will take long to finalize these documents. Several  
24 drafts of the settlement agreement have been exchanged between the parties, they have participated  
25 in several productive conference calls, and they are close to agreement on specific language on the  
26 few remaining issues left to be resolved.

**WHEREFORE**, the parties jointly request that the Court permit until April 17, 2020, to file a motion for preliminary approval of the settlement.

DATED: March 11, 2020

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**ATTESTATION**

I, Shawn A. Williams, hereby attest, pursuant to N.D. Cal. Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from each signatory.

\* \* \*

**ORDER**

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE JAMES DONATO  
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on March 11, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

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## Mailing Information for a Case 3:15-cv-03747-JD In re Facebook Biometric Information Privacy Litigation

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